Exhibit 1

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE: DEALER MANAGEMENT SYSTEMS ANTITRUST LITIGATION	MDL No. 2817 Case No. 18 C 864
This Document Relates to:	Hon. Robert M. Dow, Jr. Magistrate Judge Jeffrey T. Gilbert
Authenticom, Inc. v. CDK Global, LLC, et al., Case No. 1:18-cv-00868 (N.D. Ill.)	

**DECLARATION OF BRIAN CLEMENTS IN SUPPORT OF
AUTHENTICOM'S OPPOSITION TO DEFENDANTS' MOTION TO COMPEL
PCM LOG AND CORPORATE TESTIMONY UNDER RULE 30(B)(6)**

I, Brian Clements, have personal knowledge of the information contained herein and declare as follows:

1.   I am the Chief Operating Officer ("COO") of Authenticom, Inc. I have been employed at Authenticom in various capacities since 2006. As COO, I oversee the company's operations, including Authenticom's software development and technical team.

2.   The Polling Client Manager is a proprietary software program that Authenticom uses to manage its extractions of dealer data. The program is software.

3.   Within the software itself, the PCM logs its activities on a day-to-day rolling basis. This log of activity is stored within the software itself.

4.   The log is what is considered in technical terms as "transient data" or "ephemeral data." This is data that is created within an application session and then is reset back to its default state after an application session ends. Here, that is done on a day-to-day rolling basis within the PCM software itself.
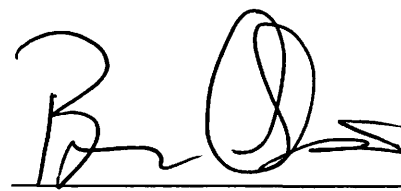
5.   Transient or ephemeral data is different from "persistent data," which is data that remains intact from session to session and is typically stored within a database on physical servers or in the cloud.

6.   Authenticom has never extracted, produced, or otherwise maintained the "transient data" within the Polling Client Manager software. When anyone at Authenticom needs to review the activity within the software, then the employee must log in and open up the program itself. The data only exists in ephemeral form within the program itself. Authenticom does not create a report or export of the transient data, and has never done so. In order to create such a report, Authenticom would have to compile the data and manually create the report itself. This would be an extremely difficult and laborious process, if it can even be done.

7.   It is also not possible for Authenticom to convert the "transient" or "ephemeral" data into "persistent data" that can be stored long-term on servers. As an initial step, Authenticom would have to rewrite the Polling Client Manager software. My software development staff is comprised of only a handful of employees after we had to layoff two-thirds of our workforce during this litigation. To rewrite the PCM software would require the efforts of my entire technical development staff. It would take weeks if not months. And even if we could rewrite the software, we would then have to store the persistent data on servers. A large number of new servers would have to be acquired, and Authenticom does not have the financial wherewithal to make such purchases.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: June 8, 2019

Brian Clements

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